

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, LONDON BRANCH,	:
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Plaintiff,	:
	:
- against -	:
	:
TESLA, INC.,	:
	:
Defendant.	:
	:
	:
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WHEREAS, Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) and Defendant Tesla, Inc. (“Tesla,” and together with JPMorgan, the “Parties”) have exchanged discovery requests on December 16, 2021, January 11, 2022, and July 8, 2022;

WHEREAS, the Parties have exchanged responses to discovery requests on January 18, 2022, February 10, 2022, and August 8, 2022;

WHEREAS, the Parties have commenced document productions;

WHEREAS, the Parties require additional time to complete fact discovery, which is currently scheduled to be completed by September 14, 2022;

WHEREAS, a pretrial conference is currently scheduled for October 6, 2022;

WHEREAS, JPMorgan and Tesla have agreed to modify the schedule as set forth below;

WHEREAS, the Parties have not previously requested an extension of these deadlines;

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the Parties that the following case deadlines shall apply:

1. **Substantial Completion of Document Productions.** The Parties shall complete their document productions by **December 16, 2022**. The current deadline for completion of fact discovery, including document productions, is **September 14, 2022**.
2. **Requests for Admission.** The Parties shall serve all requests for admission by **February 3, 2023**. The current deadline for service of requests for admission was **August 28, 2022**, which the Parties agreed to adjourn while they negotiated an overall revised case schedule.
3. **Privilege Logs.** The Parties shall exchange privilege logs by **February 3, 2023**. There is currently no deadline in the schedule for this exchange.
4. **Fact Discovery.** All fact discovery, including depositions, shall conclude by **March 24, 2023**. The current deadline for completion of fact discovery is **September 14, 2022**.
5. **Affirmative Expert Disclosures and Reports.** The Parties shall make their affirmative expert disclosures and exchange affirmative expert reports by **April 21, 2023**. The current deadline for affirmative expert disclosures and exchange of affirmative expert reports is **September 28, 2022**.
6. **Pretrial Conference.** The Parties are available for a pretrial conference on April 27, 2023, if convenient for the Court. The current date for the pretrial conference is **October 6, 2022**; the Parties are available for a status conference on this date, if amenable to the Court.
7. **Rebuttal Expert Disclosures and Rebuttal Reports.** The Parties shall make their rebuttal expert disclosures and exchange rebuttal expert reports by **May 19,**

2023. The current deadline for rebuttal expert disclosures and exchange of rebuttal expert reports is **October 29, 2022**.

8. **Reply Expert Reports.** The Parties shall exchange their reply expert reports by **June 9, 2023**. There is currently no deadline in the schedule for this exchange.
9. **Completion of Expert Discovery.** All expert discovery, including depositions, shall conclude by **June 30, 2023**. The current deadline for completion of expert discovery is **December 2, 2022**.
10. **Post-Discovery Dispositive Motion Letters.** Post-discovery dispositive motion letters shall be filed by **July 28, 2023**. The current deadline for filing of post-discovery dispositive motion letters is **December 12, 2022**.
11. **Response to Post-Discovery Dispositive Motion Letters.** Responses to post-discovery motion letters shall be filed by **August 8, 2023**. The current deadline for filing of responses to post-discovery dispositive motion letters is **December 19, 2022**.

SO STIPULATED AND AGREED.

Dated: September 12, 2022

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Memo Endorsed: The discovery deadlines are extended as set forth above. The conference currently scheduled for October 6, 2022 is adjourned to **April 27, 2023 at 11:00 a.m.** in Courtroom 705 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York.

SO ORDERED.



Hon. Paul G. Gardephe
United States District Court Judge
Dated: September 15, 2022